

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
PITTSBURGH DIVISION**

MARK FITZHENRY, individually and on  
behalf of a class of all persons and entities  
similarly situated,

Plaintiff

vs.

GUARDIAN PROTECTION SERVICES,  
INC., and SECURITY FORCE, INC.

Defendants.

Case No. 16-1253

CLASS ACTION COMPLAINT

**MOTION FOR ADMISSION *PRO HAC VICE* OF EDWARD A. BRODERICK**

Clayton Morrow, undersigned counsel for Plaintiff Mark Fitzhenry, hereby moves that Edward A. Broderick, be admitted to appear and practice in this Court in the above-captioned matter as counsel *pro hac vice* for Plaintiff pursuant to LCvR 83.2 and LCvR 83.3 and this Court's Standing Order Regarding Pro Hac Vice Admissions dated May 31, 2006 (Misc. No. 06-151).

In support of this motion, undersigned counsel attaches the Affidavit for Admission Pro Hac Vice of Edward A. Broderick filed herewith, which, it is averred, satisfies the requirements of the foregoing Local Rules and Standing Order.

Respectfully submitted,

/s/ Clayton S. Morrow  
Clayton S. Morrow  
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Dated: September 16, 2016

**CERTIFICATE OF SERVICE**

I hereby certify that, on September 15, 2016, I caused the foregoing to be electronically filed with the Clerk of the United States District Court for the Western District of Pennsylvania using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Clayton S. Morrow  
Clayton S. Morrow